

# **EXHIBIT B**

IN THE SUPERIOR COURT OF GWINNETT COUNTY  
STATE OF GEORGIA

JEFFREY KITCHENS, ) Case No. 23-C-00791-S4  
Plaintiff, )  
v. )  
PEOPLESOUT, INC., )  
Defendant. )

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**NOTICE OF FILING NOTICE OF REMOVAL**

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TO: Clerk of the Superior Court of Gwinnett County  
Gwinnett Justice & Administration Center  
75 Langley Drive S.W.  
Lawrenceville, GA 30046

William J. Smith  
Louise N. Smith  
Smith Law, LLC  
3611 Braselton Highway, Ste. 202  
Dacula, GA 30019

PLEASE TAKE NOTICE that Defendant PeopleScout, Inc., by and through counsel, in accordance with 28 U.S.C. § 1446(d), hereby provides this notice that, by filing the proper papers attached hereto as **Exhibit A** in the United States District Court for the Northern District of Georgia, Atlanta Division, on this date, Defendant hereby removes the above-styled action pending in this court to the United States District Court for the Northern District of Georgia, Atlanta Division, for adjudication by the United States District Court. Defendant requests that the Clerk of this Court take any appropriate steps required pursuant to this notice. Pursuant to the provisions of 28 U.S.C. § 1446(d), the filing of this Notice of Filing Notice of Removal effects the removal

of said action to the United States District Court for the Northern District of Georgia, Atlanta Division, and this Court shall proceed no further unless and until the case is remanded.

Respectfully submitted this 7<sup>th</sup> day of March, 2023.

*/s/ Timothy R. Newton*  
Timothy R. Newton  
*tnewton@constangy.com*  
Georgia Bar No. 542200  
David N. Korsen  
*dkorsen@constangy.com*  
Georgia Bar No. 845200

**CONSTANGY, BROOKS, SMITH  
& PROPHETE, LLP**  
230 Peachtree Street, N.W., Suite 2400  
Atlanta, Georgia 30303-1557  
Telephone: (404) 230-6777  
Facsimile: (404) 525-6955

Counsel for Defendant PeopleScout, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of March, 2023, a copy of the foregoing document Notice of Filing Notice of Removal upon Plaintiff by depositing a copy of same in the United States Mail, first-class postage prepaid, and addressed to counsel of record as follows:

William J. Smith  
Louise N. Smith  
Smith Law, LLC  
3611 Braselton Highway, Ste. 202  
Dacula, GA 30019  
william@smithlaw-llc.com  
louise@smithlaw-llc.com

*/s/ Timothy R. Newton*  
Timothy R. Newton  
tnewton@constangy.com  
Georgia Bar No. 542200

**CONSTANGY, BROOKS, SMITH  
& PROPHETE, LLP**  
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Atlanta, Georgia 30303-1557  
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